

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED
FOURTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO
INDIVIDUAL PROOFS OF CLAIM NOS. 103729 AND 98919.**

To the Honorable United States District Judge Laura Taylor Swain:

1. On December 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight”

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Board”), as the sole representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed the *One Hundred Fourteenth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9564] (the “One Hundred Fourteenth Omnibus Objection”) to various proofs of claim.

2. The One Hundred Fourteenth Omnibus Objection seeks to disallow certain deficient claims which purport to assert liabilities arising from salary or other compensation owed in connection with employment, pensions, or services provided by the claimant, but fail to provide critical information, such as the specific services provided, the salary accrued but unpaid, or other information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from: (a) Zoraida Pagán Velázquez (“Zoraida Pagán”), a copy of which is attached hereto as Exhibit “A” (the “Zoraida Pagán Response”), regarding Proof of Claim No. 103729 (the “Zoraida Pagán Claim”), and from (b) Elizabeth Pagán Velázquez (“Elizabeth Pagán”), a copy hereto as Exhibit “B” (the “Elizabeth Pagán Response,” and together with the Zoraida Pagán Response, the “Responses”), regarding Proof of Claim No. 98919 (the “Elizabeth Pagán Claim,” and together with the Zoraida Pagán Claim, the “Claims”). Certified translation of the Zoraida Pagán Response and the Elizabeth Pagán Response are attached hereto as Exhibits “A-1” and “B-1”, respectively.

4. Both the Zoraida Pagán Response and the Elizabeth Pagan Response consist of a

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

single page from the One Hundred Fourteenth Omnibus Objection. Neither however, contain, any additional information necessary to evaluate the Zoraida Pagán Claim or the Elizabeth Pagan Claim, such as an explanation of the basis for any liabilities owed to either Zoraida Pagán or Elizabeth Pagan, respectively. Accordingly, the Debtors have determined that the Zoraida Pagán Response and the Elizabeth Pagan Response still do not provide sufficient information to enable the Debtors to reconcile the Claims.

5. The Debtors therefore respectfully request that the Court grant the One Hundred Fourteenth Omnibus Objection and disallow the Claims, notwithstanding the Responses.

Dated: November 11, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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